

# **EXHIBIT O**

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

JASON WILLIAMS,

Plaintiff,

ORIGINAL

vs.

Case No. 5:19-cv-00475-BO

AT&T MOBILITY, LLC,

Defendant.

/

\*\*HIGHLY CONFIDENTIAL\*\*  
DEPOSITION OF ROBERT ARNO  
30(b)(6)

February 28, 2022

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REMOTELY REPORTED VIA VIDEO CONFERENCING

REPORTED BY:

Tamara L. Houston  
CA CSR No. 7244, RPR, CCRR No. 140  
FILE NO. 22-108895

HIGHLY CONFIDENTIAL

1 unit. I don't feel comfortable answering that  
2 question, to be honest.

3 BY MR. GALLO:

4 Q. Okay. Did you testify that they report  
14:27:22 5 privacy incidents?

6 A. That's my understanding, yes.

7 Q. But when you say that, you're not sure who  
8 they report to?

9 A. Who they report them -- who they report the  
14:27:33 10 privacy incidents to?

11 Q. Yes, that's what I meant. I'm sorry.

12 A. Yeah, that -- that business unit, I'm  
13 not -- I don't work in that business unit. I  
14 couldn't answer that 100 percent accurately.

14:27:45 15 Q. Okay. I think you also testified about  
16 letters that go out sometimes as -- you know, after  
17 or subsequent to these privacy incidents being  
18 generated.

19 Do you know to whom those letters are sent?

14:27:59 20 A. When they are sent?

21 Q. To whom.

22 A. The customer -- customer that was affected.

23 Q. Okay. Have you ever created or been  
24 involved in the creation of a privacy incident  
14:28:20 25 document?

1           A. Yes.

2           Q. Okay. How often do you think you've done  
3 that, let's say, since 2018?

4           A. Personally, I've done maybe ten.

14:28:33       5           Q. Okay. Have you ever -- have any of those  
6 been in connection with an unauthorized SIM swap  
7 claim?

8           A. Yes.

9           Q. Have you ever created a privacy incident  
10 report document at the direction of an attorney?

11          A. No.

12          Q. Okay. Why do you create -- why have you  
13 created the privacy incident reports you've created,  
14 then, if not at the direction of an attorney?

14:29:08       15         A. It's part of our obligation to report  
16 privacy incidents to that group so they can determine  
17 if, in fact, a privacy incident occurred.

18          Q. So do you personally make the decision  
19 about whether or not you're going to create a privacy  
20 incident and send it to the privacy group?

21          A. There are certain parameters that will  
22 indicate if we need to report it, and at that point,  
23 they make a judgment call if it is reportable.

24          Q. What are those parameters?

14:29:46       25         A. I don't have that in front of me.

1           Q.    Do you recall any of the parameters that  
2 you think about?

3           A.    If certain data elements was released to  
4 somebody besides the customer, that would be a  
5 potential privacy incident.

6           Q.    Would you say that you generate your -- you  
7 generate the privacy -- you've generated the privacy  
8 incidents you have generated in the ordinary course  
9 of your business?

10          A.    Yes. Part of my normal course of business.

11          Q.    Do you know who Ann Beck is?

12          A.    Name sounds familiar. She's listed as an  
13 attorney here, so...

14          Q.    You don't have any -- aside from what's  
15 listed here, you don't have -- do you have any  
16 independent knowledge of who she is?

17          A.    No.

18          Q.    Okay. Same question for Cynthia Hennessy.  
19 Do you have any independent knowledge of who she is?

20          A.    She used to be the attorney that was part  
21 of the SSSR -- SSRT team.

22          Q.    Okay. Do you know when she was part of the  
23 SSRT team?

24          A.    She was part of it at the inception until  
25 about a year ago.